

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MICHAEL DAVID SILLS and MARY SILLS,)	
)	
<i>Plaintiffs,</i>)	
)	No. 3:23-cv-00478
v.)	
)	JUDGE CAMPBELL
SOUTHERN BAPTIST CONVENTION, <i>et al.</i>)	MAGISTRATE JUDGE FRENSLEY
)	
<i>Defendants.</i>)	<i>JURY DEMAND</i>
)	
)	
)	

CASE RESOLUTION PLAN AND JOINT STATUS REPORT

Pursuant to this Court's scheduling order [Dkt. No. 208], the Parties submit the following Case Resolution Plan and Joint Status Report:

I. *PROPOSED CASE RESOLUTION.*

Plaintiffs have previously circulated a demand letter to certain Defendants and those Defendants responded. At that time, the Parties were at odds with respect to facts and law. Since that time, a considerable amount of testimony has been taken in the case, and document discovery has been substantial. Relatedly, the Parties have been able to independently assess risk, including on factual and legal aspects of the litigation. On February 11, 2025, the Parties proposed exchanging names of three mediators, and although a mediator would propose the process ultimately used in mediation, the Parties' discussed the exchange of mediation memos submitted to the mediator, plus the use of an optional confidential memo. The Parties further considered the timing of mediation, before the Parties expend substantial resources on the full work-up and presentation of experts. The Parties exchanged names of mediators on Friday, February 14, 2025.

Three names were supplied by Plaintiffs (a retired 6th Circuit Court of Appeals Justice, a retired Tenn. S. Ct. Chief Justice and a lawyer-mediator), and three names were collectively supplied by Defendants. There was no overlap between the Parties' respective proposed mediators. The Parties agreed to meet and confer for the purpose of narrowing the options.

Following a series of conferrals, the Parties were able to reach agreement on a mediator and dates. The parties anticipate conducting the mediation no later than May 31, 2025.

II. JOINT STATUS REPORT

The Parties have progressed through a substantial amount of discovery, though some important discovery remains. The Parties are also making best efforts to resolve outstanding discovery disputes. The detailed status of the litigation is fully set forth in the recently filed joint motion that sought modification to discovery deadlines. *See* Dkt. No. 207. Discovery will simultaneously proceed with the Parties' Case Resolution Plan.

Dated: February 27, 2025

Respectfully submitted,

By: /s/ Katherine B. Riley

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CERTIFICATE OF SERVICE

I, Shannon M. McNulty, hereby certify that on February 27, 2024, I served the above and foregoing on all counsel of record via the Court's CM/ECF filing system.

/s/Shannon M. McNulty
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